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*Attorneys for Plaintiff*  
7

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**  
10

11 MELANIE KEENER, an individual,  
12 Plaintiff,

13 v.

14 GERALD R. ANTINORO, an individual;  
15 STOREY COUNTY, a political subdivision  
of the State of Nevada; DOES I-V, inclusive;  
16 and ROE ENTITIES VI-X, inclusive,

17 Defendants.  
18

Case No.: 3:17-cv-00498-RCJ-CBC

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME FOR PLAINTIFF  
TO FILE AN OPPOSITION PURSUANT  
TO LOCAL RULE IA-6-1**

19 COME NOW the parties, by and through their respective undersigned counsel and file this  
20 Stipulation & Order to Extend the Time for Plaintiff to File an Opposition Pursuant to Local Rules  
21 IA 6-1 and 7-2 and in support thereof show the Court as follows:

22 **I. FACTUAL BACKGROUND**

23 On November 8, 2018, Defendant filed a Motion for Summary Judgment. Plaintiff has 21  
24 days from the date of service, plus three days pursuant to FRCP 6 to file his response. As such, the  
25 Opposition was due on December 3, 2018. On or about November 19, 2018 Plaintiff's counsel, Gus  
26 W. Flangas, Esq., spoke with Defendant's counsel, Douglas R. Rands, Esq., who agreed that  
27 Plaintiff could have an additional fifteen (15) days from the date the Opposition was due to file any  
28 Opposition to the Motion. Mr. Flangas asked Mr. Rands if it was necessary to file a Stipulation with

1 the Court informing the Court of the extension and Mr. Rands stated that, "as far as he was  
2 concerned it was not necessary." On December 3<sup>rd</sup>, 2018, an Order was issued in Case 3:18-cv-  
3 00429-HDM-WGC, granting Defendant's Motion to Dismiss pursuant to LR 7-2 because Plaintiff  
4 had failed to file an Opposition. Mr. Flangas and Mr. Rands are the attorneys representing the  
5 litigants in that case as well, and the Parties are the same parties as the parties in the case herein. Mr.  
6 Rands had also granted Mr. Flangas an extension to file any Opposition to the Motion to Dismiss  
7 in that case, but the parties had failed to file a Stipulation informing the Court. The Parties have now  
8 filed a Stipulation & Order, through their respective counsel, in Case 3:18-cv-00429-HDM-WGC  
9 seeking that the Order be Set Aside on the basis that Mr. Rands had granted an extension for the  
10 Plaintiff to file an Opposition.

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2 So that the parties do not need to seek additional relief, in the form of seeking to setting aside  
3 an Order Granting the Motion for Summary Judgment, on the basis that Plaintiff failed to file an  
4 Opposition, the parties through their respective counsel file the instant Stipulation allowing Plaintiff  
5 until December 21, 2018 to file the Opposition.

6 Dated this 4th day of December 2018 Dated this 4th day of December 2018

7 FLANGAS DALACAS LAW GROUP

RANDS, SOUTH & GARDNER

8  
9 By:   
10 GUS W. FLANGAS, ESQ.  
11 Nevada Bar No. 4989  
12 JESSICA K. PETERSON, ESQ.  
13 Nevada Bar No. 10670  
14 3275 S. Jones Blvd., Ste. 105  
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16 Tel: 702-307-9500  
17 Attorneys for Plaintiff


By: s/Douglas Rands with permission  
DOUGLAS R. RANDS, ESQ.  
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Reno, Nevada 89521  
Tel: 775-727-6464  
Attorney for Defendants

18 **ORDER**

19 IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2018

20 UNITED STATES MAGISTRATE JUDGE

21 Respectfully Submitted by:

22   
23 GUS W. FLANGAS, ESQ.  
24 Nevada Bar No. 4989  
25 JESSICA K. PETERSON, ESQ.  
26 Nevada Bar No. 10670  
27 FLANGAS DALACAS LAW GROUP  
28 3275 S. Jones Blvd., Ste. 105  
Las Vegas, Nevada 89146  
Attorneys for Plaintiff



**Jessica Peterson**

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**From:** Douglas Rands [doug\_rands@sbcglobal.net]  
**Sent:** Tuesday, December 04, 2018 3:43 PM  
**To:** 'Jessica Peterson'  
**Subject:** RE:

Yes, you have my approval...

Douglas R. Rands  
RANDS & SOUTH  
9498 Double R Blvd, Suite A  
Reno, NV 89521  
775-827-6464  
775-827-6496 fax  
[drands@rsgnlaw.com](mailto:drands@rsgnlaw.com)

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**From:** Jessica Peterson [<mailto:jkp@fdlawlv.com>]  
**Sent:** Tuesday, December 04, 2018 3:16 PM  
**To:** 'Douglas Rands'; 'Doug Rands'  
**Cc:** [gwf@fdlawlv.com](mailto:gwf@fdlawlv.com)  
**Subject:**

Doug:  
Pursuant to our conversation see attached. Please email me if these are ok to file now with your approval indicating I may use your electronic signature.

Thanks  
Jessica

**JESSICA K. PETERSON, ESQ.**  
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